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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

**BECKY WRIGHT,**

Plaintiff,

v.

**STANDARD INSURANCE COMPANY,**

Defendant.

Civil No. 3:18-cv-1948-YY

**DEFENDANT'S UNOPPOSED  
MOTION FOR EXTENSION OF  
DEADLINE TO FILE REPLY TO  
PLAINTIFF'S RESPONSE TO  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT**

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)**

Pursuant to Local Rule 7.1(a), counsel for the parties have conferred and have agreed to petition the court jointly to extend the deadlines to complete discovery as set forth herein.

**MOTION**

Pursuant to L.R. 16.3, defendant hereby seeks an extension of time within which to file our reply to plaintiff's response to defendant's motion for summary judgment. The current scheduled deadline is February 10, 2020. We respectfully request a one-week

extension to February 17, 2020. This motion is made due to the press of business and not for the purpose of delay.

DATED: February 7, 2020.

BUCHANAN ANGELI ALTSCHUL &  
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s/ Andrew Altschul

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### **CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF DEADLINE TO FILE REPLY TO PLAINTIFF’S RESPONSE TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT** on the following-named persons on the date indicated below in the manner indicated:

- ☐ mailing with postage prepaid
- ☐ hand delivery
- ☐ facsimile transmission
- ☐ email
- ☒ notice of electronic filing using the CM/ECF system

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DATED: February 7, 2020

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